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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR-12-0459 EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXCLUDING TIME UNDER
)	THE SPEEDY TRIAL ACT
v.)	
)	
MYRA B. MINKS, TIFFANY T. CONLEY,)	
LETITIA R. MAYS, and ANDREA C.)	
MOHR,)	
)	
Defendants.)	
)	

The above-captioned matter came before the Court on July 18, 2012, for initial status conference. The United States was represented by AUSA Tom Stevens. Defendant Minks was represented by Gail Shifman, defendant Conley was represented by Tim Crudo, defendant May was represented by Brian Berson, and defendant Mohr was represented by Brendan Conroy. The Court set the case for a further status conference on August 29, 2012.

Based upon the discovery recently produced by the government to the defendants, the Court, during the July 18 status conference, made findings that the time from and including July 13, 2012

STIP. AND ~~[PROPOSED]~~ ORDER RE: STA
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(which was the date through which the prior time exclusion ran), through and including August 29, 2012, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), because the ends of justice served by taking such action outweighed the best interest of the public and defendants in a speedy trial. The findings were based upon the need for the defendants and the government to have reasonable time necessary for effective preparation pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv).

The parties hereby agree, and request, that the exclusion of time described above, be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(7)(A), because the needs of justice served by the continuance outweighs the best interest of the public and the defendants in a speedy trial. This time exclusion will allow counsel for the defendants and the government effectively to prepare, taking into account the exercise of due diligence.

SO STIPULATED.

DATED: July 19, 2012

MELINDA HAAG
United States Attorney

/s

Thomas E. Stevens
Assistant United States Attorney

DATED: July 19, 2012

/s

Gail Shifman
Counsel to Myra Minks

DATED: July 19, 2012

/s

Timothy Crudo
Counsel to Tiffany Conley

DATED: July 19, 2012

/s

Brian Berson
Counsel to Letitia Mays

DATED: July 19, 2012

/s

Brendan Conroy
Counsel to Andrea Mohr

~~[PROPOSED]~~ ORDER

IT IS SO ORDERED.

DATED: July 24, 2012

EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE

